

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

No. 13-CR-607 (S-2) (JFB)

TOMMY CONSTANTINE,

Defendant.

- - - - - X

CONSTANTINE PROPOSED VOIR DIRE

The defendant Tommy Constantine ("Constantine") respectfully requests that, in addition to the Court's regular voir dire questions, the following questions be asked of prospective jurors:

1. Have you ever lost money in an investment, and, if so, do you believe you can be fair and objective in a case that involves one losing their investment?

2. Do you believe that when you make an investment, you are guaranteed a return on that investment?

3. Have you or any members of your family been employed by a law enforcement agency and if so, who and which agency?

4. Do you believe that ALL law enforcement officers are honest and always remain fair and objective during an investigation?

5. Do you believe that a law enforcement officer can be biased and as a result influence the direction and the outcome of an investigation?

6. Do you believe the government can make mistakes during an investigation that may lead to an innocent person being accused of a crime?

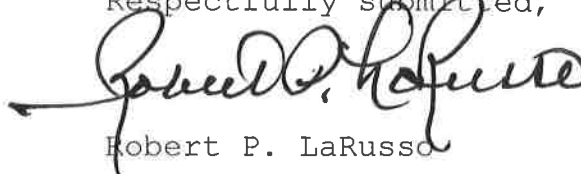
7. Are you a hockey fan?

8. Do you find Playboy Enterprises or Playboy Magazine offensive or feel that a person's association with that company or brand would influence your ability to be fair and objective towards that person?

9. Do you read the New York Daily News and do you believe that an article which has been published in that publication is absolutely fair and accurate?

Dated: April 25, 2015
Mineola, NY 11501

Respectfully submitted,



Robert P. LaRusso

cc: James M. Miskiewicz
Saritha Komatireddy
Assistant U.S. Attorneys
(via ecf)

Richard D. Healy
(via ecf)